

## Privacy Notice of Julius Baer International Advisory (Uruguay) S.A.

The following information is intended to provide you with an overview of how your personal data is processed by Julius Baer International Advisory (Uruguay) S.A. (JBIA) in Uruguay as the controller of the personal data and outlines your rights under the data protection legislation. In the following we refer to 'you' as a client, a business partner, or a prospect.

The term 'business partners' includes persons related to a client such as beneficial owners, employees, family relatives, authorised signatories, agents and/or representatives.

### 1 Contact details of JBIA and the Data Protection Advisor

Julius Baer International Advisory (Uruguay) S.A  
Zonamérica  
Edificio M2, Local 003  
Ruta 8 Km 17.500  
Montevideo, Uruguay  
jbiauy@juliusbaer.com

### 2 Which personal data is collected and processed by JBIA?

JBIA collects and processes personal data that it receives from you and that it generates as part of the business relationship with you. Personal data includes data that directly identifies you as an individual (e.g. name, address, telephone number), or that allows for identification when used in connection with other information. In addition to personal data that JBIA receives directly from you, it also collects and processes personal data about you from public sources (e.g. the Internet, social media, debtor directories, land registers, trade and association registers) or that it receives from other Julius Baer Group companies or third parties.

JBIA collects and processes the following personal data in particular:

- personal details and identification data (e.g. name, address, contact data, date and place of birth, nationality, passport, ID documents, personal situation, occupation, interests and preferences, business connections);
- authentication data (e.g. specimen signature);
- personal data arising from the preparation, execution and performance of contracts and the fulfilment of obligations, in particular related to services or transactions (e.g. transaction data including details of the principal and the recipient, powers of attorney, inquiries and requests for services);
- advertising and sales data;
- personal data relating to contacts (e.g. correspondence, inquiries, minutes of consultation, contact notes);
- information regarding your personal background and financial situation (e.g. compliance and/or regulatory related information such as origin of wealth and funds, financial knowledge and experience), and/or company-related data (such as its business activities, purpose, ownership and organisational structure and number of employees);
- sensitive personal data, such as biometric data, information regarding religious, ideological or political views or activities, information relating to health, convictions or sanctions under administrative or criminal law;
- personal data regarding related third parties such as beneficial owners, employees, family relatives, authorised signatories, agents and/or representatives;
- other personal data comparable to the categories outlined above.

### 3 For what purpose and on what legal basis does JBIA use your personal data?

#### a) To fulfil contractual obligations or take steps prior to entering into a contract

The processing of your personal data allows JBIA to provide you with the contractually agreed services, to perform contracts with you and to take steps prior to entering into a contract. Data processing is primarily driven by investment advisory services requested by you. JBIA uses your personal data, among other purposes, to identify individuals, verify documents, provide advice and to support the execution of transactions. Where applicable, further details can be found in your contract documents.

#### b) On the basis of regulatory requirements and legal obligations

JBIA's as well as other Julius Baer Group companies' activities are subject to various Uruguayan and foreign laws and regulations and JBIA and other Julius Baer Group companies have to fulfil requirements laid down by banking supervisory authorities in Uruguay and abroad, such as Central Bank of Uruguay, the Swiss National Bank, and FINMA, as well as by stock exchanges, custodians, brokers and/or other banks. The processing of personal data is used, among other things, for the verification of identity and age, prevention of fraud and money laundering, compliance, including with 'know-your-customer' requirements, monitoring and reporting obligations, assessments, investigations, analysis and management of risks of JBIA and other Julius Baer Group companies.

#### c) To pursue and protect legitimate interests of JBIA

To pursue and protect legitimate interests of JBIA it will also process your personal data for the following purposes (examples):

- communication with you in relation to your inquiries or your potential interests or to inform you about the offerings of JBIA and of other Julius Baer Group companies;
- initiation of business relationship and contact;
- prevention and investigation of breaches of contract, criminal acts and other non-compliance;
- identifying and analysis of your potential needs and optimisation of client contact;
- risk management within JBIA and Julius Baer Group companies;
- assertion of rights and legal claims and defence in legal disputes,;
- managerial oversight, consolidation and maintenance of data relating to you that JBIA and

Julius Baer Group companies process (single-client view);

- advertising, marketing, market research, or surveys;
- safeguarding JBIA's IT security and IT operations;
- outsourcing of JBIA functions and services to Julius Baer Group companies or to service providers and other agents appointed by JBIA;
- measures to ensure the security of buildings and systems.

#### d) On the basis of your consent

In particular cases your consent is requested for the processing of your personal data. Provided your consent has been obtained, JBIA may process personal data for the specific purposes where indicated. You may withdraw your consent at any time. Please note that the withdrawal of consent has no retroactive effect on the processing of your personal data.

#### e) Recording of Telephone and other Electronic Communication

JBIA may record and archive telephone conversations and electronic communication between JBIA and you with or without a prior announcement. The recordings may be used as evidence (e.g. in judicial, arbitral or regulatory proceedings), to comply with legal and regulatory obligations, for compliance or performance checks, internal investigations and for training and quality assurance purposes.

### 4 Who can access your data

#### a) Disclosure to other Julius Baer Group companies

JBIA may disclose personal data to other Julius Baer Group companies, which may process such data in particular for the purpose of performing tasks and services relating to the account holder's business relationship with JBIA and/or Julius Baer Group companies, for the purpose of international supervision and oversight, investigations, for risk management and compliance.

#### b) Disclosure to business partners and other third parties

JBIA may disclose personal data to contractual partners and other third parties, as this is deemed necessary, e.g. for efficiency gains or internal management purposes and/or for the performance of the contract with you.

Recipients may include, e.g. regulatory bodies or any other authorities.

### c) Disclosure to group-internal and third party service providers

JBIA may disclose personal data to Bank Julius Baer & Co. Ltd. or other Julius Baer Group companies, third-party service providers and their subcontractors ("Service Providers") retained to provide services for JBIA, Bank Julius Baer & Co. Ltd. or to which they outsource functions and business areas of the companies. The relevant services or functions may in particular concern the following areas: IT services (e.g. data hosting and processing, IT development, support, operation), the usage of internet-based services (e.g. online commercial register), services related to the transmission of instructions related to financial instruments and other financial assets, compliance and risk management functions, accounting (financial accounting and controlling), marketing and sales-related activities, as well as other back and middle office activities. Where the Service Providers have access to your personal data, JBIA and/or Bank Julius Baer & Co. Ltd. require them to comply with appropriate confidentiality, data protection and data security requirements.

### d) Disclosure to authorities and courts

Where required by law or regulation, or necessary to protect our legitimate rights and interests, we will disclose your personal data to third parties. This may, amongst others, include public bodies and institutions (e.g. the Central Bank of Uruguay, financial authorities, or law enforcement authorities, supervisory authorities, courts or other competent persons).

## 5 Does JBIA transfer personal data across borders?

JBIA and Bank Julius Baer & Co. Ltd. may disclose personal data to recipients outside of Uruguay, including to jurisdictions where Julius Baer Group companies are established or located (see [www.juliusbaer.com/en/about-us/our-locations](http://www.juliusbaer.com/en/about-us/our-locations)) or to other jurisdictions, including Switzerland and the EU/EEA member states and countries with an adequate level of data protection as specified by the EU Commission or other jurisdictions around the world where any of the third parties as outlined under section 4 above are located or where JBIA or Bank Julius Baer & Co. Ltd. transmit transactions or provide services.

The specific countries receiving your personal data may vary as they correspond with the applicable services and the respective purpose(s) defined in this privacy notice.

Recipients of personal data may potentially forward the information to their branches or group entities, service providers or to other market participants or authorities within and/or outside of their jurisdiction.

Individual countries to which JBIA or Bank Julius Baer & Co. Ltd. transfer your personal data may potentially not have laws that afford the same degree of protection to personal data as in Uruguay. In these cases, JBIA or Bank Julius Baer & Co. Ltd. will generally ensure an adequate level of data protection by e.g. contractual, organisational and technical measures. These include agreements that have been approved by the European Commission and the Swiss Federal Data Protection and Information Commissioner (FDPIIC), known as standard contractual clauses. You can request an example of a data transfer agreement usually employed by JBIA by contacting the Data Protection Advisor.

## 6 How long will your data be stored?

JBIA processes and retains your personal data for as long as it is required for a specific purpose for which it was collected or to comply with legal or regulatory requirements.

If your personal data is no longer required for said purposes, JBIA might still retain and process your personal data based on your consent, if required by applicable laws or regulations, or for further processing. Examples for further processing would be:

- the fulfilment of and retention obligations under applicable law;
- the fulfilment of specific regulations that require JBIA to retain the data;
- for compliance or risk management in accordance with applicable laws;
- the exercise of JBIA's rights in relation to claims and any type of legal or regulatory action, or
- if it is in JBIA's legitimate interest.

## 7 What are your rights under data protection law?

The applicable data protection legislation grants you the following rights:

- to request information on personal data that JBIA holds on record be shared with you;
- to demand that information be rectified should it be incorrect;
- to ask that your personal data be deleted if JBIA is not permitted or is not legally obliged to retain the personal data;

- to demand that the processing of this personal data shall be restricted if
  - you have disputed the accuracy of the personal data stored by JBIA and it has not yet completed its assessment,
  - you object to the deletion although JBIA may lack a legal basis for processing your personal data;
- to object to the processing by JBIA if
  - JBIA only processes personal data based on its legitimate interests – in this case it will cease the processing unless this is outweighed by its own interests or it needs to process the data in order to exercise its rights, or
  - the processing is based on your consent (e.g. for direct marketing);
- to demand that your personal data which you have provided to JBIA be transferred to a third party indicated by you in a generally useable, machine-readable, and conventional format;

You may exercise your rights in the terms and conditions foreseen in the Uruguayan data privacy regulation by contacting JBIA in the domicile or email address stated in section 1.

You also have a right to exercise the habeas data procedure foreseen in the regulation in force.

## 8 What personal data are you required to supply?

JBIA requires you to provide the personal data necessary for the acceptance and execution of a business relationship and for the fulfilment of the associated contractual and/or legal obligations. Unless it obtains these data from you, JBIA will most likely be unable to enter into a contractual relationship with you and/or provide agreed services.

Under the regulations on combating money laundering and the financing of terrorism in particular, JBIA is obligated to verify your identity based on your identification document and in this context to collect and store your address, nationality, name, date and place of birth, as well as identification data prior to the commencement of a business relationship. In order for JBIA to comply with these regulations, you are required to supply it with the necessary information. If this information changes during the business relationship, you are obliged to notify JBIA without delay. If you do not provide JBIA with the necessary information, it will not be able to commence or continue a business relationship with you.

## 9 Is the decision-making automated?

As a basic principle, JBIA does not use fully automated decision-making for commencing and conducting its business relationships. If JBIA does apply this procedure in exceptional cases, it will inform you accordingly where this is a statutory requirement.

## 10 Is your data processed automatically and used for profiling?

JBIA may process your personal data automatically in certain areas with the aim of evaluating certain personal criteria. JBIA may use your personal data to evaluate certain personal aspects relating to you, in particular to analyse aspects concerning the economic situation, personal preferences, interests, reliability, behaviour, location or change of location. JBIA may use, process, and combine publicly available data as well as third party data about you for this purpose. Profiling may take place, for example, in the following cases:

- to comply with the legal and regulatory obligations of JBIA, companies of the Julius Baer Group or service providers and agents engaged by JBIA;
- to check the client relationship and to combat money laundering, terrorist financing and asset-threatening crimes (including in payment transactions). These measures serve to protect you and to fulfil legal obligations;
- JBIA uses assessment tools to provide you with relevant and appropriate information on its products and services. This enables it to carry out demand-based communication and advertising, including market and opinion research;

## 11 Where can you find JBIA's current privacy notice?

You can find the applicable version at [www.juliusbaer.com/clientdataprivacypolicy](http://www.juliusbaer.com/clientdataprivacypolicy) #Switzerland.

JBIA reserves the right to amend this privacy notice from time to time and will inform you of such an amendment in an appropriate manner

## 12 How can you contact JBIA?

Should you have any questions about the treatment of your personal data, please contact your relationship manager or the Data Protection Advisor mentioned in section 1, who will be pleased to assist you.

Montevideo, January 2024